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March 6, 2014

Marlene Dorch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund, WC, Docket 10-90*

Dear Ms. Dorch,

Thank you for inviting expressions of non-binding interest to undertake experiments to deliver broadband to rural America. I here propose two ideas for consideration.

Idea One: Attached please find a January 14, 2014, Op Ed from the Washington Post. Our company strongly supports this vision, pioneered by Google, US Ignite, and others, for Gigification of America. We are doing our small part today, with some rural 6,000 homes connected to GigE, and with all homes in our service area to be connected by mid-2015. We would like to see more FCC Connect America funds allocated to expand Vermont's GigE to homes. Our company, and Vermont's Fairpoint, Comcast and soon to be acquired Time Warner, Burlington Telecom, EC Fiber, and more, might be candidates to compete for such funds.

Idea Two: We see many unserved Vermont, New Hampshire, and upstate New York regions, in your identified census blocks, that could be readily served by rural 4G/LTE wireless facilities, including new rural towers, new rural fiber, new rural micro-transmitters, and new rural investments into E-911 facilities. These investments would use FCC radio frequencies already owned by our company, and a state-of-the-art 4G/LTE core also owned by us, requiring an incremental investment estimated at some $40 million. We would eagerly participate in an FCC application process along these lines also.

Thank you,

Diane Guité
Vice President, Business Development

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The Washington Post

Opinion: America's most underutilized resource? Plain old telephone poles.

BY MICHEL GUITE, January 14, 2014

My small telephone company in rural Vermont is today delivering billion-bits-per-second, or gigabit, Internet to 3,400 rural homes, and we'll build gigabit Internet to all 17,500 homes in our area by year-end 2014. Customers seem to love it. Vermonters who once told us "Wireless is all I need" have come back, logging more Internet usage on both fiber and wireless.

We're a tiny part of what Internet visionary Robert Metcalfe—who invented Ethernet—calls The Gigification of America. We're happily in the shadow of Google's much larger gigabit fiber projects in Kansas City, Austin and Utah. Nonetheless, our Vermont project has persuaded me that America has the potential to build the world's fastest Internet access, and that it would be a tragedy to let the opportunity slip away.

The U.S. will likely keep slipping in world broadband rankings if we place our hopes primarily on wireless. Visitors to rural China see new wireless towers poking out above the trees on almost every mountaintop, with tens of thousands more built every year, achieving ubiquity that would be hard to match in our more process-oriented U.S.A. For America to keep up, we need both wireless networks and fiber-optic ones.

But America has an important resource that has become unloved and overlooked: tens of millions of humble wood telephone and electric poles that took 150 years for America to install. They're placed along hundreds of thousands of miles of right-of-way, and they would cost billions of dollars to replicate today.

I'm biased because my company owns a lot of these phone poles, but I take it personally when critics deride the phone poles on my 125-year-old rural network. Critics point to the sagging and obsolete coaxial cable TV wires, and obsolete copper telephone wires, dangling overhead. But my personal view is these telephone and electric utility poles have a lot of potential. They could carry the millions of miles of new optical fiber needed to bring gigabit Internet to every home, farmhouse, and school from Hawaii to Maine, and Alaska to Texas.

The Gigification of America is probably the best thing that could happen to accelerate yet more growth in American wireless. Optical fibers delivering gigabit speeds on tens of millions of phone poles means efficient backhaul to millions of new pole-based wireless micro-antennae, using new FCC-allocated wireless frequencies.

"No bars of service" would become rapidly outdated, on every ranch in Montana, on every remote island in Maine, and along every street in every city and town in America. Mobile speeds of over 100 megabits per second could become ubiquitous. The days of tourists reporting superb wireless coverage in rural China, and then dropped calls at JFK and Washington National Airport, would rapidly become a fond memory.

Based on our experience building fiber-optic infrastructure in Vermont, we estimate it would cost about $800 billion to install state-of-the-art Google-type fiber for every American. That would deliver gigabit connectivity today with the option to upgrade to 10-gigabit connections in the future. That is about the cost of a mid-sized U.S. skirmish in the Middle East.

I want to see the day President Obama announces from The White House: "The Gigification of America is our national goal, and we will coordinate tax policies, manufacturing incentives and federal and state regulations to make it happen, integrated with wireless. It will mean better schools, better health care, more innovation, more commerce, and will help revitalize quality of life in rural America. America invented the Internet, and we plan to lead the world in Internet speeds using fiber and wireless for the next century."

Michel Guité was Salomon Brothers' telecommunications equipment analyst before he bought telephone lines serving 14 rural Vermont villages from GTE (now Verizon) in 1993, and formed Vermont Telephone Co. In 2010, his company received stimulus grants of $125 million to build optical fiber with gigabit Internet to 17,500 rural homes, and LTE wireless broadband to all of unserved rural Vermont.